

**COVINGTON & BURLING**

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

TELEFAX: (202) 662-6291

**DOCKET FILE COPY ORIGINAL**

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 44-171-495-5655

TELEFAX: 44-171-495-3101

BRUSSELS CORRESPONDENT OFFICE

44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-549-5230

TELEFAX: 32-2-502-1598

**JENNIFER A. JOHNSON**

DIRECT DIAL NUMBER

(202) 662-5552

DIRECT TELEFAX NUMBER

(202) 778-5552

JJOHNSON@COV.COM

October 30, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**RECEIVED**

**OCT 30 1997**


**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

**Re: KRON-TV, San Francisco, CA  
MM Docket No. 87-268  
Six-Month Progress Report on DTV Implementation**

Dear Mr. Caton:

The Chronicle Publishing Company, licensee of station KRON-TV (San Francisco, California), hereby submits an original and four copies of the six-month progress report on KRON-TV's DTV implementation activities, as required under paragraph 76 of the *Fifth Report and Order*, MM Docket No. 87-268 (rel. April 21, 1997). Please direct any questions regarding this report to the undersigned.

Sincerely,

  
Jonathan D. Blake  
Jennifer A. Johnson

*Counsel for The Chronicle Publishing Company*

Enclosures

No. of Copies rec'd 074  
List ABCDE

**COVINGTON & BURLING**

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

TELEFAX: (202) 662-6291

**DOCKET FILE COPY ORIGINAL**

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 44-171-495-5655

TELEFAX: 44-171-495-3101

BRUSSELS CORRESPONDENT OFFICE

44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-549-5230

TELEFAX: 32-2-502-1598

**JENNIFER A. JOHNSON**

DIRECT DIAL NUMBER

(202) 662-5552

DIRECT TELEFAX NUMBER

(202) 778-5552

JJOHNSON@COV.COM

October 30, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**RECEIVED**

**OCT 30 1997**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

**Re: KRON-TV, San Francisco, CA  
MM Docket No. 87-268  
Six-Month Progress Report on DTV Implementation**

Dear Mr. Caton:

The Chronicle Publishing Company ("Chronicle"), licensee of station KRON-TV (San Francisco, California), by its attorneys hereby submits this six-month progress report on its DTV implementation activities in compliance with paragraph 76 of the *Fifth Report and Order* in the *DTV Proceeding*.<sup>1/</sup> As shown herein, KRON-TV has invested a great deal of time, planning and resources to ensure that its DTV facilities are constructed by the November 1, 1998 voluntary deadline. Although KRON-TV faces a number of challenges in planning and constructing its digital facilities, several of which we do not have unilateral control over, we currently have no reason to doubt our ability to successfully complete construction of KRON-TV's digital facilities by the November 1, 1998 date. The following sets forth in general terms our current plans for meeting this deadline, our implementation activities to date, and certain challenges and potential hurdles that we may face in moving forward.

---

<sup>1/</sup> *Fifth Report and Order*, MM Docket No. 87-268 (rel. April 21, 1997) at ¶ 76 and n.164.

Mr. William F. Caton  
KRON-TV Six-Month Progress Report  
October 30, 1997  
Page 2

### Site Considerations

KRON-TV plans to construct its digital facilities at its current transmitter site, Sutro Tower, located at 1 La Avanzada, San Francisco, California 94131-1124. Sutro Tower is particularly well-suited for KRON-TV's digital facilities because it has two power feeds, KRON-TV has its own generator at this site, and a water reservoir is adjacent to the property. The Sutro Tower site is owned by Sutro Tower, Inc., which in turn is owned by Chronicle and the corporate parents of three other stations operating at the site (KTVU, KPIX-TV and KGO-TV). Six other television stations also operate from Sutro Tower pursuant to leasing arrangements -- KQED, KBHK-TV, KCNS, KPST-TV, KOFY-TV and KMTP-TV.

In March 1994, Sutro Tower Inc. hired Kline Towers and Dielectric Communications to plan a transitional DTV antenna structure for Sutro Tower. In April 1995, that plan was completed. The antenna structure will be added to one face of Sutro Tower. This year, work commenced to strengthen Sutro Tower to hold the new antenna structure and transitional digital antennas.

Kline Towers (P.O. Box 1013, Columbia, S.C. 29202) is the tower manufacturer that originally designed and built Sutro Tower. Kline Towers has designed the reinforcements required to permit the new antenna structure to be mounted on Sutro Tower. This new structure will support the four transitional digital antennas. Dielectric Communications (Tower Hill Road, Raymond, ME 04071) has designed the transitional digital antennas and the combiners which will permit several stations to share each antenna. To date, Sutro Tower Inc. has made payments totalling \$1,734,000 to Dielectric Communications, Kline Towers, and other vendors in connection with the construction of these facilities, and has made commitments for an additional \$2,085,000 to cover the costs and installation of the transitional antennas and combiners.

Four transitional digital antennas will be mounted on Sutro Tower, and these antennas will be shared by all of the television stations transmitting from the site. Each transitional digital antenna will transmit the signals of either two or three stations. The transitional antenna on which KRON-TV plans to operate will be located at an elevation of roughly 732 feet, which is lower on the tower than KRON-TV's existing antenna and lower than the elevation specified in the Commission's DTV table of allotments/assignments in Appendix B to the *Sixth Report and Order*.<sup>2/</sup> KRON-TV plans to submit an application to the Commission requesting authorization to operate at

---

<sup>2/</sup> *Sixth Report and Order*, MM Docket No. 87-268 (rel. April 21, 1997) at Appendix B.

Mr. William F. Caton  
KRON-TV Six-Month Progress Report  
October 30, 1997  
Page 3

this elevation during the transition and may, if appropriate, request an increase in power to offset this decreased height. At the end of the transition, KRON-TV plans to move its DTV operations to the elevation of its existing antenna (the elevation specified in the Commission's table).

If the City of San Francisco grants Sutro Tower Inc.'s application for authority to mount the support structure and antennas (see below), we believe the antenna structure will be in place and ready for testing no later than August 1998.

### **Digital Transmission Equipment**

In May 1997, KRON-TV sent a letter of intent to its intended transmitter vendor, Larcan Communications Equipment, Inc., a division of LDL Communications, Inc. (228 Ambassador Drive, Mississauga, Ontario, Canada L5T 2J2). Larcan has provided KRON-TV with a proposed contract for the purchase and installation of a digital transmitter. The projected cost of the transmitter and installation is \$908,000. We are currently reviewing the proposed contract and anticipate entering into an agreement for purchase and installation of the transmitter by the end of November 1997. We hope to receive the transmitter by June 1998. The exact timing for installation of the transmitter will depend on the status of the antenna installation and the resolution of any problems resulting from the co-location of an adjacent-channel digital station (see below).

### **Government Approvals**

On August 14, 1996, Sutro Tower Inc. filed a request for environmental review of the digital television project with the City of San Francisco. Sutro Tower Inc. presently is responding to comments filed by interested parties and awaits a hearing on the environmental impact report ("EIR") by the Planning Commission. Only upon acceptance of the EIR will the Planning Commission consider the permit for the antennas and antenna structure.

Sutro Tower Inc. filed a permit application with the City of San Francisco on May 13, 1997, requesting permission to perform the structural reinforcement of Sutro Tower. This permit was granted on August 5, 1997. On September 25, 1997, Sutro Tower Inc. filed a permit application for authorization to mount the antenna structure and transitional antennas on the tower. This application is still pending. All equipment orders are on hold pending grant of that permit.

Mr. William F. Caton  
KRON-TV Six-Month Progress Report  
October 30, 1997  
Page 4

### **Technical Challenges Based On Co-Located Adjacent-Channel Stations**

KRON-TV was assigned DTV channel 57, and has major technical concerns relating to the assignment of adjacent DTV channel 56 to KTVU -- another television station located at the Sutro Tower site. KRON-TV is concerned about "cross-coupling" of these co-located adjacent channel signals, meaning that some of the energy from KTVU's DTV signal will penetrate our antenna, and some of the energy from our DTV signal will penetrate KTVU's antenna. There is no prior art concerning the technical arrangements for co-located adjacent channels. Therefore, we cannot predict the outcomes which may result from this situation. We anticipate that KRON-TV will need to make some adjustments or take other appropriate steps to remedy any problems stemming from this co-located adjacent-channel scenario.

Like all DTV stations, KRON-TV will need to operate its digital transmitter with a channel filter. Because other stations will be transmitting from the same antenna as KRON-TV, this channel filter will feed a channel combiner which also will function as a filter. Until we conduct field tests, we will not know how these two filters will interact. As noted above, it is also possible that energy from an adjacent channel may return to the transmitter through the filters and generate spurious signals.

### **Uncertainties in the FCC's Allotments**

Many of the more than 230 petitions for reconsideration filed in response to the *Sixth Report and Order* propose changes to the Commission's table of DTV assignments/ allotments that could affect the channel-specific equipment KRON-TV purchases for its DTV facilities. Moreover, KRON-TV lies within one of the acute problem areas of the country identified in the petition for reconsideration filed by a number of major broadcast organizations and supported by numerous other petitioners. Affected parties may file suggested channel improvements for those areas and to address the recently discovered DTV-to-DTV adjacent channel interference problem. Such improvements could affect the DTV allotments/assignments in San Francisco.

\* \* \*

COVINGTON & BURLING

Mr. William F. Caton  
KRON-TV Six-Month Progress Report  
October 30, 1997  
Page 5

Any questions regarding this six-month progress report should be directed to the undersigned.

Sincerely

A handwritten signature in black ink, appearing to read "Jonathan D. Blake", with a long horizontal flourish extending to the right.

Jonathan D. Blake  
Jennifer A. Johnson

*Counsel for The Chronicle Publishing Company*